

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re:)	Case No:	19-06719
Patricia Keaton)		
Debtor,)	Chapter:	Chapter 13
)		
)	Judge:	Timothy A. Barnes

NOTICE OF MOTION

To: Patricia Keaton, PO Box 121195, Chicago, IL, 60612

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604

Office of the US Trustee, Dirksen Federal Court House, 219 South Dearborn Street, Room 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on **June 6, 2019 at 9:30 a.m.**, I shall appear before the Honorable Judge Timothy A. Barnes in 219 S. Dearborn, Courtroom 744, Chicago, IL, 60604 and then and there present the attached **MOTION TO OBTAIN POSTPETITION CREDIT**, a copy of which is attached hereto.

By: /s/Dale Riley
Dale Riley

CERTIFICATE OF SERVICE

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, at 55 E. Monroe, Chicago, Illinois, before the hour of 5:30 p.m., on May 22, 2019.

/s/ Dale Riley
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960

Carmax AUTO Finance
Attn: Bankruptcy Dept.
12800 Tuckahoe Creek Pkw
Richmond VA 23238

Illinois Corporation Service Co
Registered Agent For Carmax AUTO
Finance
Attn: Bankruptcy Department
801 Adlai Stevenson Dr.,
Springfield IL 62703

DS Services OF America INC
C/O Collection Bureau OF A
25954 Eden Landing Rd
Hayward CA 94545

Lutheran General Hospital
Bankruptcy Deparmtent
1775 Dempster St.
Park Ridge IL 60068

Syncb/CARE CREDIT
Attn: Bankruptcy Dept.
950 Forrer Blvd
Kettering OH 45420

Syncb/SAMS CLUB DC
Attn: Bankruptcy Dept.
Po Box 965005
Orlando FL 32896

Syncb/Walmart
Attn: Bankruptcy Dept.
Po Box 965024
Orlando FL 32896

US BANK
Attn: Bankruptcy Dept.
4325 17Th Ave S
Fargo ND 58125

US BANK Hogan LOC
Attn: Bankruptcy Dept.
Po Box 5227
Cincinnati OH 45201

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)	Judge:	Timothy A. Barnes

MOTION TO OBTAIN POSTPETITION CREDIT

NOW COMES the Debtor, Mrs. Patricia Keaton (the "Debtor"), by and through her attorneys, Geraci Law LLC, to present her **MOTION TO OBTAIN POSTPETITION CREDIT**, and states as follows:

1. This Court has jurisdiction pursuant to 11 U.S.C. 1334 and this is a "core proceeding" under 28 U.S.C. 157(b).
2. The Debtor filed a petition for bankruptcy protection under Chapter 13 of the US Bankruptcy Code and a plan of reorganization on 03/12/2019.
3. The Debtor now seeks to obtain a credit card for emergency use.
4. The Debtor wishes to obtain a credit card with BMO Harris Bank with a credit line of up to \$2,000 and an annual percentage rate between 13.99% and 20.99%.
5. The credit card will not impair Debtor's ability to maintain her Chapter 13 plan payments as she does not intend to carry a balance on the card.

WHEREFORE, the Debtor, Mrs. Patricia Keaton, prays that this Court enter an order permitting her to obtain post-petition credit and for such further additional relief that this Court may deem just and proper.

/s/ Dale Riley
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

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